

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VICTORIANO TAVAREZ, Individually, and  
On Behalf of All Others Similarly Situated,

Plaintiff,

vs.

MOO ORGANIC CHOCOLATES, LLC,

Defendant.

x

Case No.: 1:21-cv-09816-VEC

**MOTION TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF**

\_x

I, Jarrett S. Charo, an attorney duly admitted to practice before this Court, respectfully request, pursuant to Local Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, that the Court grant me leave to withdraw as counsel for plaintiff in the above-entitled action.

I certify under penalty of perjury that the following is true and correct:

1. I am an attorney admitted to practice in the United States District Court, Southern District of New York.

2. I am presently of counsel to the law firm of Mizrahi Kroub LLP, attorneys for plaintiff in the above-entitled action (“Plaintiff”).

3. Pursuant to Local Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I hereby respectfully seek an order from the Court granting my request to withdraw as counsel for Plaintiff in this action.

4. I respectfully seek this order because, effective December 6, 2022, I will no longer be of counsel to Mizrahi Kroub LLP. However, at least one other attorney from Mizrahi Kroub LLP has filed a Notice of Appearance for Plaintiff in this action and Plaintiff is duly represented by such counsel in this action.

5. This action is in its early stages with Plaintiff having filed his operative complaint on November 21, 2022.

6. I further respectfully request that any further notices regarding this action be terminated as to me and that I be removed from the Court's service list with respect to this action.

7. Plaintiff is aware of this motion and does not object to its filing. I do not assert a retaining or charging lien in this matter.

8. A copy of this Motion will be served upon all counsel via ECF and upon Plaintiff.

Respectfully submitted,

DATED: December 2, 2022

**MIZRAHI KROUB LLP**

/s/ Jarrett S. Charo

JARRETT S. CHARO

EDWARD Y. KROUB  
JARRETT S. CHARO  
225 Broadway, 39<sup>th</sup> Floor  
New York, NY 10007  
Telephone: 212/595-6200  
212/595-9700 (fax)  
ekroub@mizrahikroub.com  
jcharo@mizrahikroub.com

*Attorneys for Plaintiff*